

Remarks

The Office Action mailed April 7, 2006 has been carefully reviewed and the following remarks have been made in consequence thereof.

Claims 1, 2, and 4-20 are now pending in this application. Claims 1, 2, and 4-20 are rejected. Claim 3 is objected to. Claim 3 is canceled without prejudice, waiver, or disclaimer. Claims 1, 5, and 14 have been amended. No new matter has been added.

In accordance with 37 C.F.R. 1.136(a), a one-month extension of time is submitted herewith to extend the due date of the response to the Office Action dated April 7, 2006 for the above-identified patent application from July 7, 2006 through and including August 7, 2006. In accordance with 37 C.F.R. 1.17(a)(1), authorization to charge a deposit account in the amount of \$120.00 to cover this extension of time request also is submitted herewith.

The rejection of Claims 5-20 under 35 U.S.C §112, second paragraph, is respectfully traversed.

The Office Action states on page 2 that it is not clear how one of Applicants projections can extend radially. Applicants respectfully traverse the statement.

Applicants submit that one skilled in the art, after reading the specification in light of the figures, would understand Claim 5. Specifically, the specification describes, for example, "Mounting system 31 is formed integrally with housing 30 and includes a plurality of raised projections 60 that extend from housing outer surface 54 a distance 62...Projections 60 are spaced circumferentially around housing 30 such that adjacent projections 60 are equi-spaced at an angle Φ measured with respect to a center axis of symmetry 64 of the motor, and with respect to each other...In a further alternative embodiment, angle Φ is more than ninety degrees, and housing 30 includes less than four projections 60 in the same cross-sectional plane...Each projection 60 extends a distance 62 from outer surface 54 such that a recess 100 defined therein. Recess 100 includes a depth 102 and inner surface 104 with a diameter 106." (Figure 4, page 3, lines 24-25, page 4, lines 1-3, 7-9, and 28-30). Accordingly, the specification describes, for example, that a number of

projections less than four extend circumferentially around housing 30 a distance 62 from outer surface 54 to form a recess 100 including inner surface 104. Hence, the specification provides an example of at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface. As such, Applicants respectfully submit that Claim 5 particularly points out and distinctly claims the subject matter the Applicants regard as the invention. Claims 6-13 depend, directly or indirectly, from independent Claim 5. Accordingly, Applicants respectfully submit that Claims 5-13 satisfy Section 112, second paragraph and respectfully request that the section 112 rejection of Claims 5-13 be withdrawn.

Moreover, Applicants submit that one skilled in the art, after reading the specification in light of the figures, would understand Claim 14. Specifically, the specification describes, for example, "Mounting system 31 is formed integrally with housing 30 and includes a plurality of raised projections 60 that extend from housing outer surface 54 a distance 62...Projections 60 are spaced circumferentially around housing 30 such that adjacent projections 60 are equi-spaced at an angle Φ measured with respect to a center axis of symmetry 64 of the motor, and with respect to each other...In a further alternative embodiment, angle Φ is more than ninety degrees, and housing 30 includes less than four projections 60 in the same cross-sectional plane...Each respective projection 60 is sized to receive fastener head 82 such that head top surface 84 is substantially co-planar with housing inner surface 52 when fastener 80 is fully installed within each projection 60...In the exemplary embodiment, each respective projection 60 is sized to receive fastener head 82 such that head bottom surface 86 is substantially flush with housing inner surface when fastener 80 is fully installed within each projection 60...Each projection 60 extends a distance 62 from outer surface 54 such that a recess 100 defined therein. Recess 100 includes a depth 102 and inner surface 104 with a diameter 106." (Figure 4, page 3, lines 24-25, page 4, lines 1-3, 7-9, 18-23, and 28-30). Accordingly, the specification describes, for example, that a number of projections less than four extend circumferentially around housing 30 a distance 62 from outer surface 54 to form a recess 100 including inner surface 104. Moreover, the specification describes, for example, that each respective projection 60 is sized to receive fastener head 82 such that head top surface 84 is substantially co-planar with housing inner surface 52 when fastener 80 is fully installed within each projection 60. Hence, the specification

provides an example of at least one fastener extends radially outwardly through the housing such that the top surface is substantially co-planar with the inner surface. As such, Applicants respectfully submit that Claim 14 particularly point outs and distinctly claims the subject matter the Applicants regard as the invention. Claims 15-20 depend, directly or indirectly, from independent Claim 14. Accordingly, Applicants respectfully submit that Claims 14-20 satisfy Section 112, second paragraph and respectfully request that the section 112 rejection of Claims 14-20 be withdrawn.

Accordingly, Applicants respectfully request that the section 112 rejection of Claims 5-20 be withdrawn.

The rejection of Claims 1, 2, and 4-20 under 35 U.S.C. § 103(a) as being unpatentable over Fisher et al. (U.S. Patent No. 6,005,314) in view of Admitted Prior Art (APA), in further view of Story et al. (U.S. Patent No, 3,787,014), and in further view of Boede et al. (U.S. Patent No. 4,933,809) is respectfully traversed.

Fisher et al. describe an air switch housing (96) that is positioned within a motor shell (56), and an air switch boss (94) that extends from the air switch housing through a motor shell opening (62) (column 6, lines 16-19). The air switch boss is threaded, and a nut (102) is threadedly engaged to the air switch boss and tightened against a shell (56) (column 6, lines 19-20).

APA describe a plurality of mounting hardware or fasteners (20) that are attached to a shell outer surface (16) and extend radially outwardly from the shell outer surface (page 3, lines 3-5). More specifically, the fasteners are spaced circumferentially around a housing (10), and are welded to the shell outer surface (page 3, lines 5-7).

Story et al. describe a replacement motor (52) that differs from a plurality of original equipment motors employed in inside-out type air conditioning units in that it comprises a stationary outer housing (54) (column 3, lines 4-7). A replacement motor mounting (50) is completed by a plurality of fasteners (66) which are received in a plurality of fastener receiving holes (5) of the replacement motor and in either a

plurality of fastener receiving holes (62) or a plurality of fastener receiving holes (64) of a bracket (58) to secure the motor to the bracket (column 3, lines 27-39).

Boede et al. describe a plurality of cover mounting holes (56) (column 4, lines 49-53). The cover mounting holes on an interior surface of a cover are recessed and each includes a bottom flange (57), the underside of which bears on the top of an interior cover mounting boss (28) as a mounting screw (52) or bolt is threaded into the boss (column 4, lines 49-53). The cover covers a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly (column 2, lines 16-20).

Claim 1 has been amended to include the recitations of Claim 3, which has been indicated to contain allowable subject matter if rewritten to include all of the limitations of the base claim, which is Claim 1, and any intervening claims. Accordingly, Claim 1 is submitted to be in condition for allowance.

Applicants respectfully traverse a statement on page 5 of the Office Action. The statement on page 5 states, "However, it would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified the depth of the recess to be substantially equal the height of the fastener head as is well known in the art such that the head is substantially co-planar with the un-recessed portion of the inner surface."

Applicants respectfully submit that Claim 1 does not recite "the depth of the recess to be substantially equal the height of the fastener head such that the head is substantially co-planar with the un-recessed portion of the inner surface". Rather, Claim 1 includes "attaching the fasteners through the openings formed in the housing, such that the fasteners extend radially outwardly through the housing and a head of each of the fasteners is substantially co-planar with an un-recessed portion of the inner surface of the housing and such that the head of each of the fasteners remain positioned between rotating components of the motor and the housing outer surface".

Claims 2 and 4 depend from independent Claim 1. When the recitations of Claims 2 and 4 are considered in combination with the recitations of Claim 1,

Applicants submit that dependent Claims 2 and 4 likewise are also submitted to be in condition for allowance.

Claim 5 recites a motor housing configured to receive a motor extending between a pair of endshields, the housing comprising “an inner surface; an outer surface, said inner surface configured to extend between a rotating component of the motor and said outer surface; a housing body extending between said inner surface and said outer surface, said body comprising a thickness; at least one raised projection extending radially outwardly from at least one of said housing inner surface and said housing outer surface defining a recess with respect to said housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor, said projection comprising at least one opening extending therethrough, said at least one raised projection comprising an inner surface and a thickness equal to said housing body thickness; and at least one fastener having a top surface, said at least one fastener extends outwardly through said housing opening such that said top surface is substantially co-planar with an un-recessed portion of said housing inner surface.”

None of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest a motor housing as recited in Claim 5. Specifically, none of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor, the projection including at least one opening extending therethrough, the at least one raised projection including an inner surface and a thickness equal to the housing body thickness, and at least one fastener having a top surface, the at least one fastener extends outwardly through the housing opening such that the top surface is substantially co-planar with an un-recessed portion of the housing inner surface. Rather, Fisher et al. describe a nut is threadedly engaged to an air switch boss and tightened against a shell. A description of the nut that is threadedly engaged to the air switch boss does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a

recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. APA describes a plurality of fasteners that are spaced circumferentially around a housing, and are welded to the shell outer surface. A description of the fasteners that are welded to the shell outer surface does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. Story et al. describe a plurality of fasteners which are received in a plurality of fastener receiving holes of a replacement motor and in a plurality of fastener receiving holes of a bracket to secure the motor to the bracket. A description of the fasteners that are received in the fastener receiving holes of the replacement motor does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. Boede et al. describe a mounting screw or bolt that is threaded into a boss located within a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly. A description of the bolt that is threaded into a boss located within the box including the components for interconnection does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. The box including the components is not the housing body including the assembly of the stator and the rotating component. Accordingly, none of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor, the projection including at least one opening extending therethrough, the at least one raised projection including an inner surface and a thickness equal to the housing body thickness, and at least one fastener having a top surface, the at least one fastener

extends outwardly through the housing opening such that the top surface is substantially co-planar with an un-recessed portion of the housing inner surface. For the reasons set forth above, Claim 5 is submitted to be patentable over Fisher et al. in view of APA, in further view of Story et al., and in further view of Boede et al.

Claims 6-13 depend from independent Claim 5. When the recitations of Claims 6-13 are considered in combination with the recitations of Claim 5, Applicants submit that dependent Claims 6-13 likewise are patentable over Fisher et al. in view of APA, in further view of Story et al., and in further view of Boede et al.

Claim 14 recites a motor comprising “a pair of endshields; a housing extending between said endshields and including an assembly of a stator and a rotor, wherein said housing includes at least one raised projection extending outwardly from said housing, said housing comprising an outer surface, an opposite inner surface, and a body extending therebetween, said body comprising a thickness, said at least one raised projection defining a recess with respect to said housing inner surface and comprising an inner surface and a thickness equal to said housing body thickness, at least one opening extending through said recess, and at least one fastener having a top surface, said at least one fastener extends radially outwardly through said housing such that said top surface is substantially co-planar with said inner surface, wherein said housing inner surface extends between said stator-rotor assembly and said housing outer surface.”

None of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest a motor as recited in Claim 14. Specifically, none of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest a housing extending between the endshields and including an assembly of a stator and a rotor, where the housing includes at least one raised projection extending outwardly from the housing, the at least one raised projection defining a recess with respect to the housing inner surface and including an inner surface and a thickness equal to the housing body thickness, at least one opening extending through the recess, and at least one fastener having a top surface. Rather, Fisher et al. describe a nut is threadedly engaged to an air switch boss and tightened against a shell. A description of the nut that is threadedly engaged to the air switch boss does not teach a housing extending between the endshields and including an

assembly of a stator and a rotor, where the housing includes at least one raised projection extending outwardly from the housing. APA describes a plurality of fasteners that are spaced circumferentially around a housing, and are welded to the shell outer surface. A description of the fasteners that are welded to the shell outer surface does not teach a housing extending between the endshields and including an assembly of a stator and a rotor, where the housing includes at least one raised projection extending outwardly from the housing. Story et al. describe a plurality of fasteners which are received in a plurality of fastener receiving holes of a replacement motor and in a plurality of fastener receiving holes of a bracket to secure the motor to the bracket. A description of the fasteners that are received in the fastener receiving holes of the replacement motor does not teach a housing extending between the endshields and including an assembly of a stator and a rotor, where the housing includes at least one raised projection extending outwardly from the housing. Boede et al. describe a mounting screw or bolt that is threaded into a boss located within a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly. A description of the bolt that is threaded into a boss located within the box including the components for interconnection does not teach a housing extending between the endshields and including an assembly of a stator and a rotor, where the housing includes at least one raised projection extending outwardly from the housing. The box including the components is not the housing including the assembly of the stator and the rotor. Accordingly, none of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest a housing extending between the endshields and including an assembly of a stator and a rotor, where the housing includes at least one raised projection extending outwardly from the housing, the at least one raised projection defining a recess with respect to the housing inner surface and including an inner surface and a thickness equal to the housing body thickness, at least one opening extending through the recess. For the reasons set forth above, Claim 14 is submitted to be patentable over Fisher et al. in view of APA, in further view of Story et al., and in further view of Boede et al.

Claims 15-20 depend from independent Claim 14. When the recitations of Claims 15-20 are considered in combination with the recitations of Claim 14,

Applicants submit that dependent Claims 15-20 likewise are patentable over Fisher et al. in view of APA, in further view of Story et al., and in further view of Boede et al.

Moreover, Applicants respectfully traverse a statement on page 5 of the Office Action. The statement on page 5 states, “Regarding claims 4 and 19,...it would have been obvious...to have modified the motor mount by substituting a weld, crimp, or adhesive for nuts attached to the fasteners...since welds, crimps, adhesives, and nuts are well known for their use in the fastening art and the selection of any of these well known equivalents to secure the bolts to the housing surface would be within the level of ordinary skill in the art.”

Applicants respectfully request that the Examiner provide documentary evidence describing “attaching the fasteners further comprises crimping the fasteners to the inner surface of the housing” as recited in Claim 4 and “wherein said plurality of fasteners are attached to said inner surface of said at least one raised projection by at least one of a weld, a crimp, and an adhesive” as recited in Claim 19. Applicants respectfully submit that the Examiner takes official notice of “attaching the fasteners further comprises crimping the fasteners to the inner surface of the housing” as recited in Claim 4 and “wherein said plurality of fasteners are attached to said inner surface of said at least one raised projection by at least one of a weld, a crimp, and an adhesive” as recited in Claim 19 because the Examiner suggests, in the statement on page 5, that welds, crimps, adhesives, and nuts are well known for their use in the fastening art.

If Applicant adequately traverses the Examiner’s assertion of official notice, the Examiner must provide documentary evidence in the next office action if the rejection is to be maintained (MPEP § 2144.03(C)). Applicants respectfully submit that “attaching the fasteners further comprises crimping the fasteners to the inner surface of the housing” as recited in Claim 4 and “wherein said plurality of fasteners are attached to said inner surface of said at least one raised projection by at least one of a weld, a crimp, and an adhesive” as recited in Claim 19 are not well-known in the art because none of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest attaching the fasteners to the inner surface as recited in Claims 4 and 19. Rather, Fisher et al. describe a nut is threadedly engaged to an air switch boss and tightened against a shell. APA describes a plurality of

fasteners that are spaced circumferentially around a housing, and are welded to the shell outer surface. Story et al. describe a plurality of fasteners which are received in a plurality of fastener receiving holes of a replacement motor and in a plurality of fastener receiving holes of a bracket to secure the motor to the bracket. Boede et al. describe a mounting screw or bolt that is threaded into a boss located within a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly. Accordingly, Applicants respectfully submit that “attaching the fasteners further comprises crimping the fasteners to the inner surface of the housing” as recited in Claim 4 and “wherein said plurality of fasteners are attached to said inner surface of said at least one raised projection by at least one of a weld, a crimp, and an adhesive” as recited in Claim 19 are not well-known in the art and respectfully request that the Examiner provide documentary evidence describing attaching the fasteners to the inner surface as recited in Claims 4 and 19.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1, 2, and 4-20 be withdrawn.

The rejection of Claims 5-13 under 35 U.S.C. § 103(a) as being unpatentable over APA in view of Story et al., and further in view of Boede et al. is respectfully traversed.

APA, Story et al., and Boede et al. are described above.

Claim 5 is recited above.

None of APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest a motor housing as recited in Claim 5. Specifically, none of APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor, the projection including at least one opening extending therethrough, the at least one raised projection including an inner surface and a thickness equal to the housing body thickness, and at least one fastener having a

top surface, the at least one fastener extends outwardly through the housing opening such that the top surface is substantially co-planar with an un-recessed portion of the housing inner surface. Rather, APA describes a plurality of fasteners that are spaced circumferentially around a housing, and are welded to the shell outer surface. A description of the fasteners that are welded to the shell outer surface does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. Story et al. describe a plurality of fasteners which are received in a plurality of fastener receiving holes of a replacement motor and in a plurality of fastener receiving holes of a bracket to secure the motor to the bracket. A description of the fasteners that are received in the fastener receiving holes of the replacement motor does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. Boede et al. describe a mounting screw or bolt that is threaded into a boss located within a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly. A description of the bolt that is threaded into a boss located within the box including the components for interconnection does not teach at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor. The box including the components is not the housing body including the assembly of the stator and the rotating component. Accordingly, none of APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest at least one raised projection extending radially outwardly from at least one of the housing inner surface and the housing outer surface defining a recess with respect to the housing inner surface of the housing body including an assembly of the rotating component and a stator of the motor, the projection including at least one opening extending therethrough, the at least one raised projection including an inner surface and a thickness equal to the housing body thickness, and at least one fastener having a top surface, the at least one

fastener extends outwardly through the housing opening such that the top surface is substantially co-planar with an un-recessed portion of the housing inner surface. For the reasons set forth above, Claim 5 is submitted to be patentable over APA, in view of Story et al., and in further view of Boede et al.

Claims 6-13 depend from independent Claim 5. When the recitations of Claims 6-13 are considered in combination with the recitations of Claim 5, Applicants submit that dependent Claims 6-13 likewise are patentable over APA, in view of Story et al., and in further view of Boede et al.

Moreover, Applicants respectfully traverse a statement on page 8 of the Office Action. The statement on page 8 states, “Regarding claim 12,...it would have been obvious...to have modified the motor mount by substituting a weld, crimp, or adhesive for nuts attached to the fasteners...because welds, crimps, adhesives, and nuts are well known for their use in the fastening art and the selection of any of these well known equivalents to secure the bolts to the housing surface would be within the level of ordinary skill in the art.”

Applicants respectfully request that the Examiner provide documentary evidence describing “wherein said at least one fastener is attached to said housing inner surface by at least one of a weld, a crimp, and an adhesive” as recited in Claim 12. Applicants respectfully submit that the Examiner takes official notice of “wherein said at least one fastener is attached to said housing inner surface by at least one of a weld, a crimp, and an adhesive” as recited in Claim 12 because the Examiner suggests, in the statement on page 8, that welds, crimps, adhesives, and nuts are well known for their use in the fastening art.

If Applicant adequately traverses the Examiner’s assertion of official notice, the Examiner must provide documentary evidence in the next office action if the rejection is to be maintained (MPEP § 2144.03(C)). Applicants respectfully submit that “wherein said at least one fastener is attached to said housing inner surface by at least one of a weld, a crimp, and an adhesive” as recited in Claim 12 is not well-known in the art because none of APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest the at least one fastener is attached to the housing inner surface by at least one of a weld, a crimp, and an adhesive. Rather,

APA describes a plurality of fasteners that are spaced circumferentially around a housing, and are welded to the shell outer surface. Story et al. describe a plurality of fasteners which are received in a plurality of fastener receiving holes of a replacement motor and in a plurality of fastener receiving holes of a bracket to secure the motor to the bracket. Boede et al. describe a mounting screw or bolt that is threaded into a boss located within a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly. Accordingly, Applicants respectfully submit that “wherein said at least one fastener is attached to said housing inner surface by at least one of a weld, a crimp, and an adhesive” as recited in Claim 12 is not well-known in the art and respectfully request that the Examiner provide documentary evidence describing the at least one fastener is attached to the housing inner surface by at least one of a weld, a crimp, and an adhesive.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 5-13 be withdrawn.

Moreover, Applicants respectfully submit that the Section 103 rejections of Claims 1, 2, and 4-20 are not proper rejections. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Fisher et al., APA, Story et al., or Boede et al., considered alone or in combination, describe or suggest the claimed combination. Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Fisher et al. with APA, Story et al., or Boede et al. because there is no motivation to combine the references suggested in the cited art itself.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP 2143.01. Rather, there must be some suggestion, outside of Applicants’ disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion or

motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

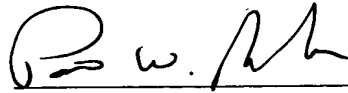
Furthermore, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejections are based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Fisher et al. teach a nut is threadedly engaged to an air switch boss and tightened against a shell. APA teaches a plurality of fasteners that are spaced circumferentially around a housing, and are welded to the shell outer surface. Story et al. teach a plurality of fasteners which are received in a plurality of fastener receiving holes of a replacement motor and in a plurality of fastener receiving holes of a bracket to secure the motor to the bracket. Boede et al. teach a mounting screw or bolt that is threaded into a boss located within a box including a plurality of components for interconnection of a plurality of external input/output leads supplying power to and from an assembly. Since there is no teaching nor suggestion in the cited art for the combination, the Section 103 rejections appear to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejections of Claims 1, 2, and 4-20 be withdrawn.

For at least the reasons set forth above, Applicants respectfully request that the rejections of Claims 1, 2, and 4-20 under 35 U.S.C. 103(a) be withdrawn.

Claim 3 has been indicated to contain allowable subject matter if rewritten to include all of the limitations of the base claim and any intervening claims. Applicants have canceled Claim 3.

In view of the foregoing amendment and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "P. W. Rasche", written over a horizontal line.

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